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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12  
13 Plaintiff,  
14 v.  
15 JAKARR DUDLEY,  
16 Defendant.

Case No. 2:20-CR-037-GMN-NJK

**STIPULATION TO CONTINUE  
PRETRIAL MOTION DEADLINES**  
(First Request)

17  
18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
19 Trutanich, United States Attorney, and Brian Y. Whang, Assistant United States Attorney,  
20 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
21 and Raquel Lazo, Assistant Federal Public Defender, counsel for Jakarr Dudley, that the  
22 previously ordered deadline for filing of pretrial motions be vacated and that the parties herein  
23 shall have to and including September 11, 2020, within which to file the Defendant's pretrial  
24 motions currently due September 7, 2020.

25 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
26 shall have to and including September 25, 2020, to file any and all responsive pleadings,  
currently due September 21, 2020.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including October 2, 2020, to file any and all replies to dispositive motions,  
3 currently due September 28, 2020.

4 The Stipulation is entered into for the following reasons:

5 1. Defense counsel requires additional time to investigate issues pertaining to the  
6 suppression motion.

7 2. The defendant is incarcerated and does not object to the continuance.

8 3. The parties agree to the continuance.

9 4. The additional time requested herein is not sought for purposes of delay, but  
10 merely to allow counsel for defendant sufficient time within which to discuss the proposed  
11 resolution with her client.

12 5. Additionally, denial of this request for continuance could result in a miscarriage  
13 of justice.

14 This is the first stipulation to continue filed herein.

15 DATED this 8<sup>th</sup> day of September 2020.

16 RENE L. VALLADARES  
17 Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

18 */s/ Raquel Lazo*  
19 By \_\_\_\_\_

20 RAQUEL LAZO  
Assistant Federal Public Defender

*/s/ Brian Y. Whang*  
By \_\_\_\_\_

BRIAN Y. WHANG  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JAKARR DUDLEY,

7 Defendant.

Case No. 2:20-CR-037-GMN-NJK

FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER

9  
10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
12 Court finds that:

13 1. Defense counsel requires additional time to investigate issues pertaining to the  
14 suppression motion.

15 2. The defendant is incarcerated and does not object to the continuance.

16 3. The parties agree to the continuance.

17 4. The additional time requested herein is not sought for purposes of delay, but  
18 merely to allow counsel for defendant sufficient time within which to discuss the proposed  
19 resolution with her client.

20 5. Additionally, denial of this request for continuance could result in a miscarriage  
21 of justice.

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**ORDER**

IT IS THEREFORE ORDERED that the parties herein shall have to and including September 11, 2020 within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including September 25, 2020 to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including October 2, 2020 to file any and all replies to dispositive motions.

DATED this 9<sup>th</sup> day of September 2020.

  
UNITED STATES MAGISTRATE JUDGE